

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Del Shea Perry, Trustee for the Heirs and
Next of Kin of Hardel Harrison Sherrell and
Personal Representative for the Estate of
Hardel Harrison Sherrell,

Case No. 19-cv-02580 KMM/LIB

Plaintiff,

vs.

Beltrami County;
MEnD Correctional Care, PLLC;
Sanford Health;
Sanford; Sanford Medical Center Fargo;
Calandra Allen (Jail Administrator),
Andrew Richards (Assistant Jail
Administrator), Edward Busta (Program
Director),
Corrections Sergeant Tyler Carraway,
Corrections Sergeant Anthony Derby,
Corrections Sergeant Mario Scandinato,
Corrections Officer Melissa Bohlmann,
Corrections Officer Jared Davis,
Corrections Officer Dana Demaris,
Corrections Officer Brandon Feldt,
Corrections Officer James Foss,
Corrections Officer Daniel Fredrickson,
Corrections Officer Chase Gallinger,
Corrections Officer Holly Hopple,
Corrections Officer Nicholas Lorsbach,
Corrections Officer Erin Meyer,
Corrections Officer Mitchell Sella,
Corrections Officer Christopher Settle,
Corrections Officer Marlon Smith,
Corrections Officer Jacob Swiggum,
Corrections Officer Joseph Williams,
Beltrami County employees, all in their
individual and official capacities and as

agents/employees of Beltrami County;
Todd Leonard, MD, Crystal Pedersen, RN,
Michelle Skroch, RN, and Madison
Brewster, Health Technician, MEnD
Correctional Care employees, all in their
individual and official capacities and as
agents/employees of MEnD Correctional
Care, PLLC;
Dustin G. Leigh, MD, individually and as
employee/agent of Sanford Health and/or
Sanford and/or Sanford Medical Center
Fargo,

Defendants.

MOTION FOR SUMMARY JUDGMENT

TO: Plaintiff and her attorney, Zorislav R. Leyderman, 222 South 9th Street,
Suite 1600, Minneapolis, MN 55402

YOU WILL PLEASE TAKE NOTICE that the undersigned attorneys for
Defendants Beltrami County, Calandra Allen, Melissa Bohlmann, Edward Busta,
Tyler Carraway, Jared Davis, Dana Demaris, Anthony Derby, Brandon Feldt,
James Foss, Daniel Fredrickson, Chase Gallinger, Holly Hopple, Nicholas
Lorsbach, Erin Meyer, Andrew Richards, Mario Scandinato, Mitchell Sella,
Christopher Settle, Marlon Smith, Jacob Swiggum, Joseph Williams will move the
above-named Court for an Order directing that, pursuant to Rule 56 of the Federal
Rules of Civil Procedure, Defendants are entitled to summary judgment in their
favor dismissing the action on the general grounds that there is no genuine issue

as to any material fact and that Defendants are entitled to a judgment as a matter of law.

Dated: June 1, 2022

s/Julia C. Kelly
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Andrew Richards, Mario Scandinato,
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